



April 11, 2024

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VIA ECF

The Honorable McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: *Palm Valley Music LLC v. Citizen Watch Company of America, Inc. d/b/a Bulova*, Case No. 1:24-cv-01637-CM

Dear Judge McMahon:

We are counsel for Plaintiff Palm Valley Music LLC ("Plaintiff") in the above referenced action. Pursuant to Your Honor's Individual Practices and Procedures Rule I.D. we write this letter to request an adjournment of the pre-trial conference in this action scheduled for April 18, 2024, along with an extension of the deadline to submit a Civil Case Management Plan.

As stated in this Court's Order dated March 6, 2024 (ECF Doc. No. 6, the "Order"), the pre-trial conference for this action is scheduled for April 18, 2024 at 11:30 a.m. As further stated in the Order, the parties were directed to fax a Civil Case Management Plan to the Court within thirty (30) days of the date of the Order.

However, Defendant recently waived service of the complaint in this action (ECF Doc No. 7) on April 8, 2024. Accordingly, Plaintiff's counsel requests that this Court: (1) adjourn the pre-trial conference from April 18, 2024 to June 7, 2024; and (2) extend the deadline to submit a Civil Case Management Plan from April 5, 2024 to May 11, 2024.

The parties have made no previous requests for adjournments or extensions in this action. Defendant's counsel has consented to the adjournment and extension outlined in this letter motion. The adjournment of the pre-trial conference and the extension of the deadline to submit the Civil Case Management Plan does not affect any other scheduled dates in this matter.

We thank the Court for its attention to this matter.

Very truly yours,

/s/ Robert W. Clarida
Robert W. Clarida

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cc: Counsel of Record